

1 *[Parties and Counsel Listed on Signature Pages]*

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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13 IN RE: SOCIAL MEDIA ADOLESCENT  
14 ADDICTION/PERSONAL INJURY  
15 PRODUCTS LIABILITY LITIGATION,  
16

Case No. 4:22-MD-03047-YGR

MDL No. 3047

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THIS DOCUMENT RELATES TO ALL  
ACTIONS

**JOINT STATUS REPORT ON  
PROTOCOL FOR PRODUCTION OF  
EXPERT-RELATED DOCUMENTS**

Judge: Honorable Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

1 The PI/SD Plaintiffs and the State Attorneys General (“Plaintiffs”) and Defendants  
 2 (collectively, “the Parties”) respectfully submit this Joint Status Report on Protocol for Production  
 3 of Expert-Related Documents, pursuant to the Court’s Case Management Order Nos. 17 and 18.

4 Pursuant to the Court’s Case Management Order Nos. 17 and 18, the Parties have met-and-  
 5 conferred regarding disclosure of expert-related documents, and have agreed that the following  
 6 materials considered do *not* need to be produced with the experts’ reports:

- 7 • Plaintiffs’ medical records (provided the records are identified by Bates number in the  
 8 expert’s report and/or materials considered list);
- 9 • Records produced by any party to the MDL proceeding (provided the records are identified  
 10 by Bates number in the expert’s report where the document is discussed and/or materials  
 11 considered list);
- 12 • Deposition testimony taken in the MDL proceeding (provided specific testimony is  
 13 identified in the expert’s report where the document is discussed and/or materials  
 14 considered list); or
- 15 • Publicly available medical or scientific literature (provided the journal, volume and page  
 16 number are included in the expert report and/or materials considered list).

17 The Parties continue to meet and confer regarding a production protocol relating to expert  
 18 data analysis, which they anticipate they will submit for the Court’s consideration on or before  
 19 April 28, 2025.

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 22 Dated: April 21, 2025

Respectfully submitted,

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**ATTESTATION**

I, Rose L. Ehler, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: April 21, 2025

By: /s/ Jonathan H. Blavin  
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